

Charleston Management Services
A Division Of Cummins Engine Company, Inc.
4500 Leeds Avenue, Suite 206-A
Charleston, South Carolina
29405



Site:	Cummins Eng
Break:	2.4
Other:	Va

May, 2001

Ms. Roberta M. Runge
On-Scene Coordinator
United States Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

Re: Cummins Engine Company

Dear Ms. Runge:

As you know, Cummins has submitted to you a Proposed Remediation Plan ("Plan") for the ditch located adjacent to Cummins' Charleston, South Carolina facility. We understand that EPA has approved the Plan; however, you requested that Cummins provide a timeline for performing the activities outlined in the Plan. In our conference call of May 29, 2001, representatives of Cummins proposed to you that the ditch remediation be coordinated with a capital project for removing Cummins' outfall to the ditch. As you requested in our telephone conference, we are writing to provide you with the rationale for performing the ditch remediation activities following the capital project and a timeline for performing all of these activities.

We understand that EPA wants to proceed with the ditch remediation as soon as practical, and Cummins' Plan is designed to be both effective and efficient. Because of the capital project that will eliminate Cummins' outfall to the ditch, we propose that the remediation be implemented after the capital project. Factors that support coordination of the ditch remediation activities with the capital project are as follows:

1. Cummins wants to be certain that its outfall does not have even the potential of impacting the ditch in the future. Also, Cummins wants to address any alleged impact, past or future, from its outfall. Performing the



remediation after Cummins' outfall is removed from the ditch will insure that any potential impact from Cummins to the ditch has been addressed.

2. Pursuant to the order and various conversations with you, Cummins has taken measures to insure that storm water runoff from its facility does not impact the ditch. Cummins has a maintenance schedule in place to inspect and maintain these measures, which include the continued maintenance of booms in the ditch. Any concerns about impact to the ditch pending the ditch remediation activities should therefore be addressed.
3. Diversion of all storm water to the lagoon system will require enlargement of the current system and permitting by the South Carolina Office of Ocean and Coastal Resource Management ("OCRM"). While Cummins' consultant has begun discussions with OCRM, time will be needed for the permitting process.

The anticipated timeline for both the capital project and the ditch remediation is as follows:

<u>Activity</u>	<u>Completion Date</u>
Submit Plan To OCRM For Capital Project Concerning Lagoon System	June 1, 2001
Receive Comments From OCRM	June 20, 2001
Bid Packages For Capital Project To Contractors	July 11, 2001
Receive Bids On Capital Project	July 25, 2001
Begin Construction Of Capital Project	August 20, 2001
Complete Construction Of Capital Project	October 20, 2001
Begin Ditch Remediation Project	October 30, 2001
Completion Of Ditch Remediation Project	November 16, 2001
Submission Of Final Ditch Remediation Report To EPA	November 29, 2001

We appreciate your consideration of this proposal. For the reasons stated above, we would appreciate your approval to proceed with the capital project ahead of the remediation project in accordance with the above schedule. Please contact Jim Thiel or me if you have any questions or if you need any additional information.

Sincerely,

A handwritten signature in cursive script that reads "Frank Zito". The signature is written in black ink and is positioned below the word "Sincerely,".

Frank Zito